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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. 4:19-cv-04281-KAW
	)	
Plaintiff,	)	<b>UNITED STATES' RESPONSE TO</b>
	)	<b>ORDER TO SHOW CAUSE</b>
v.	)	
	)	
BTC-e, a/k/a CANTON BUSINESS CORP.,	)	
	)	
and	)	
	)	
ALEXANDER VINNIK,	)	
	)	
Defendants.	)	

On March 31, 2025, the Court lifted the stay of this civil action and ordered plaintiff United States of America (“United States”) to “[show cause] by April 14, 2025 why the July 2022 entry of default [of defendants BTC-e and Alexander Vinnik (“Vinnik”)] should not be set aside.” ECF No. 46 (“Order”). Accordingly, the United States respectfully files this response to the Order.

The United States consents to setting aside the Clerk’s entry of default of BTC-e and Vinnik.

The United States had previously reported that “the Clerk’s entry of default of BTC-e and Vinnik remains proper,” ECF No. 45, because BTC-e and Vinnik had failed to timely respond to the complaint after being served abroad on November 18, 2021. ECF Nos. 34–35. BTC-e and Vinnik also have not filed any motion seeking to set aside entry of default, which requires a showing of “good cause.” Fed. R. Civ. P. 55(c); *Liguore v. Simmons*, No. 24-CV-01621-LB, 2024 WL 4112332, at \*5–6 (N.D. Cal.

1 Sept. 5, 2024) (citing *Hawaii Carpenters' Tr. Fund v. Stone*, 794 F.2d 508, 513 (9th Cir. 1986)).  
2 Nonetheless, to the extent the Court finds it appropriate to set aside the Clerk's entry of default of  
3 BTC-e and Vinnik, the United States consents to doing so, and will respectfully request that the Clerk  
4 re-enter default of BTC-e and Vinnik only if they again fail to timely respond to the United States'  
5 complaint, e.g., by the May 2, 2025 deadline set forth in the Order.

6  
7 Respectfully submitted,

8 PATRICK D. ROBBINS  
9 Acting United States Attorney

10 Dated: April 14, 2025

By: /s/ Savith Iyengar  
11 SAVITH IYENGAR  
12 Assistant United States Attorney  
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